

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHAMILIA, LLC,	)	
	)	
Plaintiff,	)	Civil Action No.: 04-CV-06017 (KMK)
	)	
v.	)	
	)	
PANDORA JEWELRY, LLC,	)	
	)	
Defendant.	)	

**PLAINTIFF’S MOTION TO FILE EXHIBITS UNDER SEAL**

Plaintiff Chamilia, LLC “Chamilia” hereby moves to file certain exhibits to its Memorandum Of Law In Opposition To Defendant’s Motion For Summary Judgment under seal. These exhibits have been designated as confidential pursuant to a protective order governing discovery in this matter and should not be made public. The exhibits in question are the following:

Declaration of Jeffrey Julkowski, Exhibit A  
Declaration of James G. Goggin, Exhibits A, H

Chamilia’s electronic filing does not contain these exhibits, but the courtesy copies sent to the Court’s chambers and the copies served on opposing counsel do contain them.

Dated: August 15, 2005

Respectfully submitted,

/s/ James G. Goggin  
James G. Goggin (*pro hac vice*)  
Dylan Smith (DS 6740)

VERRILL DANA, LLP  
One Portland Square  
P.O. Box 586  
Portland, ME 04112  
(207) 774-4000  
(207) 774-7499 (fax)

Attorneys for Plaintiff Chamilia, LLC

CERTIFICATE OF SERVICE

I, James G. Goggin, hereby certify that I have this day caused a copy of the foregoing Plaintiff's Memorandum of Law In Opposition to Defendant's Motion for Summary Judgment to be sent by first class mail to counsel of record as follows:

William R. Hansen, Esq.  
Lathrop & Gage  
230 Park Avenue, Suite 1847  
New York, NY 10169

Dated: August 15, 2005

/s/ James G. Goggin  
James G. Goggin